E.6
6/9/05

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June 9, 2005

William Ryczek
Emergency Enforcement & Support Section, SEJ
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Supplement to RRG/Clayton Chemical Superfund Site June 18, 2003 Response to 104(e) Information Request

Dear Mr. Ryczek:

Enclosed please find a supplement to the Koch Industries, Inc. ("Koch") June 18, 2003 response to EPA's May 19, 2003 CERCLA Section 104(e) Information Request regarding the RRG/Clayton Chemical Superfund Site in Sauget, Illinois.

If you have any questions concerning this supplemental response please contact me.

Sincerely,

STINSON MORRISON HECKER LLP

Parthenia B. Evans

PBE:nh
Enclosures

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Koch Industries, Inc.

Supplemental Response to EPA Region V CERCLA Section 104(e) Information Request for RRG/Clayton Chemical Superfund Site

July 8, 2005

Koch Industries, Inc. ("Koch") has made further investigations regarding possible connection to the RRG/Clayton Chemical Company Superfund Site ("Site"). This Supplemental Response is to provide additional information in response to questions 1, 2 and 14 in EPA's May 19, 2003 CERCLA Section 104(e) Information Request to Koch.

Question 1.

Bill R. Bromley
Safety & Compliance Manager
Koch Pipeline Co., L.P.
P.O. Box 64596
St. Paul, MN 55164
Phone - (651) 480-3887

Question 2.

Respondents to Administrative Order by Consent, Docket No. V-W-03-C-72 acquired documents that were housed at the Site and retain those documents at the Thompson Coburn law offices in St. Louis, in approximately 340 boxes. Koch is not one of the Respondents. After Koch's June 18, 2003 response to the May 19, 2003 Information Request, Koch was able to negotiate access to those documents. The enclosed Appendix C documents have been drawn from Koch's review of boxes in the repository that appeared to potentially have any information relative to Koch. Koch is providing documents from the repository that are specifically relevant to Koch and responsive to EPA's May 19, 2003 information request. In addition, some of the Appendix C documents are from Koch Pipeline, L.P. records that Koch was able to

search for and identify based upon information found in the Thompson Coburn document repository. All documents that constitute a supplement to Koch's June 18, 2003 response are in Appendix C and are Bates labeled KPL 042 through KPL 086.

Question 14.

During Koch's further investigation, documents in the Thompson Coburn document repository were located indicating that Dowell Schlumberger, Inc. was involved in the Koch Pipeline February 1992 tank cleanout. These documents are included in Appendix C.

This concludes Koch's Supplemental Response.

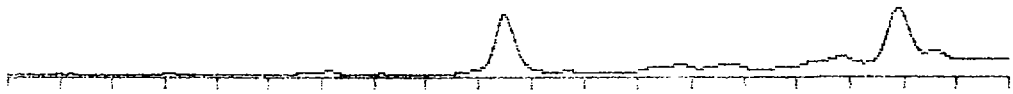
GENERATOR: KOCH PIPELINE DATE: 01/30/92

DESTINATION: CLAYTON CHEMICAL LAB NUMBER: 16494

PDS NUMBER: PROFILE NUMBER:

****

HEAT VALUE (BTU/LB):	15,653	DISTIL. YIELD (V/V %):	N/A
CHLORINE (W/W %):	0.27	K-F (W/W %):	N/A
DENSITY (g/mL DIRTY):	0.875	ACID ACCEPTANCE:	N/A
DENSITY (g/mL CLEAN):	N/A	ACIDITY (W/W %):	N/A
COMPATIBILITY:	OK	B. S. & W. (V/V %):	2
FLASH POINT (DEG. F):	75	COLOR (ASTM #):	N/A
G.C. SOLV:	N.D.	G.C. PCB'S:	N/A
pH:	N/A	LEAD (ppm):	N/A
ASH (W/W %):	3.65	VISCOSITY:	N/A



1-20 Min Scale: 1000 Mv
16494 Processed: 01-27-1992 11:29:42, segment 1, cycle 1
RAW DATA SAVED IN FILE E:164941.PTS

EXTERNAL STANDARD TABLE

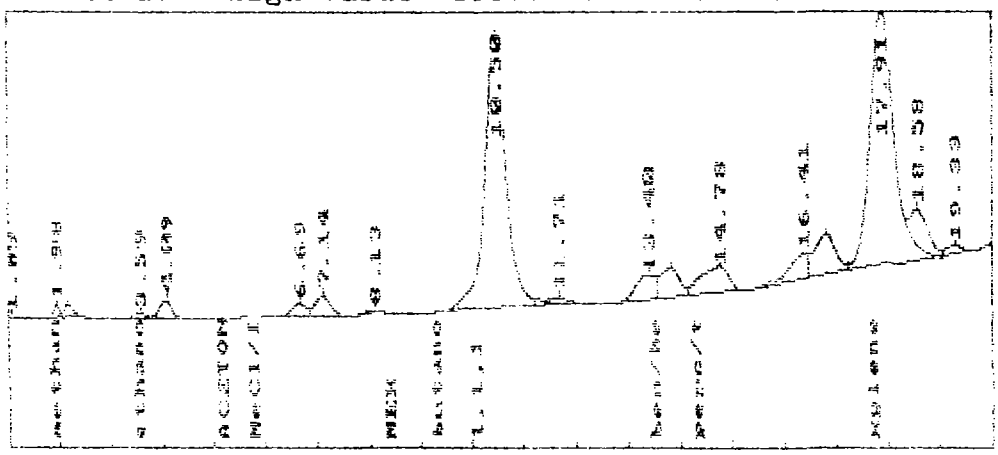
********** 01-27-1992 11:29:52 Version 5.1 **********
* Sample Name: 16494 Data File: E:164941 *
* Date: 01-27-1992 11:30:13 Method: TEST 01-07-1992 13:57:45 # 107 *
* Interface: 16 Cycle#: 1 Operator ff Channel#: 0 Vial#: N.A. *
* Starting Peak Width: 5 Threshold: 10 Area Threshold: 500 *
****

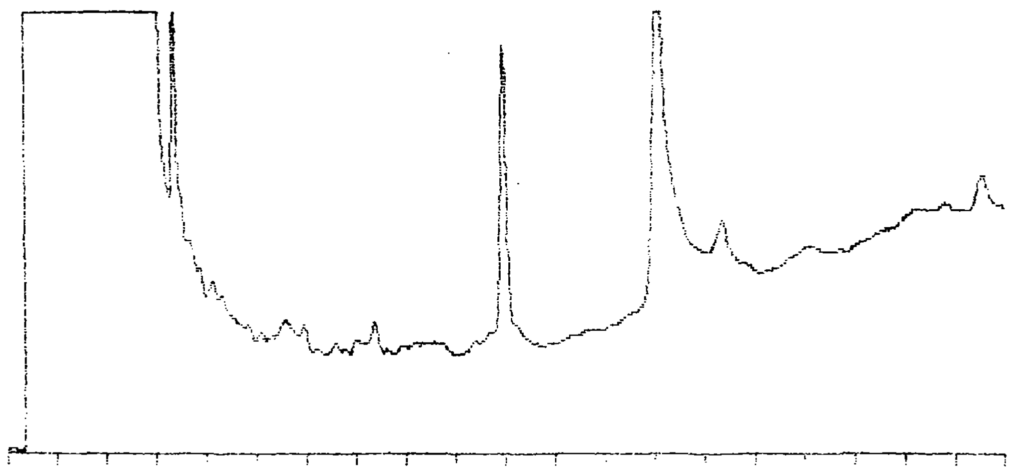
Starting Delay: 1.00 Ending retention time: 20.00
Area reject: 100 One sample per 0.500 sec.
Amount injected: 1.00 Dilution factor: 1.00
Sample Weight: 1.00000

PEAK NUM	RET TIME	PEAK NAME	CONCENTRATION in %	NORMALIZED CONC	AREA	HEIGHT	AREA/ HEIGHT	BL	REF PEAK	% DELTA RET TIME	CONC/AREA
2	1.983	methanol	0.0609	2.0177%	49909	6215	8.0	2	0	3.930	1.2202E-06
4	3.592	ethanol	0.0232	0.7686%	27493	2119	13.0	2	0	1.650	8.4382E-07
8	8.125	MEK	0.0086	0.2849%	12175	743	16.4	1	0	-3.465	7.0624E-07
9	10.500	1,1,1	0.9044	29.9637%	3806363	131987	28.8	2	0	4.132	2.3761E-07
11	13.400	ben/hept	0.1297	4.2958%	286340	11821	24.2	2	0	-.6794	4.5283E-07
13	14.775	perc/tol/mibk	0.3104	10.2851%	506239	12521	40.4	2	0	3.261	6.1323E-07
16	17.908	xylene	1.5811	52.3843%	4103701	125417	32.7	3	0	1.224	3.8530E-07

TOTAL AMOUNT = 3.0184

Areas, times, and heights stored in: E:164941.ATB
Data File = E:164941.PTS Printed on 01-27-1992 at 11:30:01
Start time: 1.00 min. Stop time: 20.00 min. Offset: 0 mv.
Low Value: 5444 uv High Value: 156777 uv Scale factor: 1.0





0-20 Min Scale: 500 Mv
P6492 Processed: 01-30-1992 06:55:18, segment 1, cycle 1
RAW DATA SAVED IN FILE E:P64921.PTS

***** EXTERNAL STANDARD TABLE *****

******************** 01-30-1992 06:55:29 Version 5.1 ********************
* Sample Name: P6492 Data File: E:P64921 *
* Date: 01-30-1992 06:55:44 Method: 1242 12-16-1991 23:03:52 # 13 *
* Interface: 16 Cycle#: 1 Operator ff Channel#: 0 Vial#: N.A. *
* Starting Peak Width: 10 Threshold: 1 Area Threshold: 100 *
****

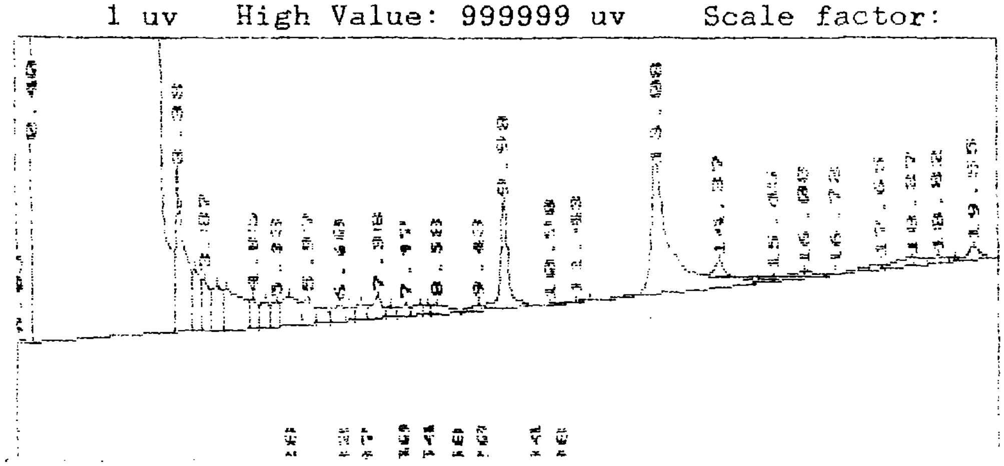
Starting Delay: 0.00 Ending retention time: 20.00
Area reject: 0 One sample per 1.000 sec.
Amount injected: 1.00 Dilution factor: 1.00
Sample Weight: 1.00000

PEAK NUM	RET TIME	PEAK NAME	CONCENTRATION in 1	NORMALIZED CONC	AREA	HEIGHT	AREA/ HEIGHT BL	REF PEAK	% DELTA RET TIME	CONC/AREA
11	5.583 28		60.8953	10.2038%	2349436	92028	25.5 2	11	0	2.5919E-05
14	6.600 32		43.0952	7.2212%	984022	52459	18.8 2	11	-.8098	4.3795E-05
16	7.033 37		37.9954	6.3666%	832387	51647	16.1 2	11	-1.603	4.5646E-05
19	7.967 40		13.7959	2.3117%	560134	34155	16.4 2	11	.9827	2.4630E-05
20	8.233 47	25ppm	39.1043	6.5524%	510843	33679	15.2 2	11	.7859	7.6549E-05
21	8.400 54		20.3790	3.4148%	308844	31857	9.7 2	11	0	6.6028E-05
23	9.433 70		17.0082	2.8499%	395713	21368	18.5 2	11	-.7351	4.2981E-05
24	9.983 78		364.1362	61.0156%	4146605	348993	11.9 2	11	2.563	8.7815E-05
25	10.900 98		0.3824	0.0641%	4122	902	4.6 2	11	-2.099	9.2765E-05

TOTAL AMOUNT = 596.7920

KPL 044

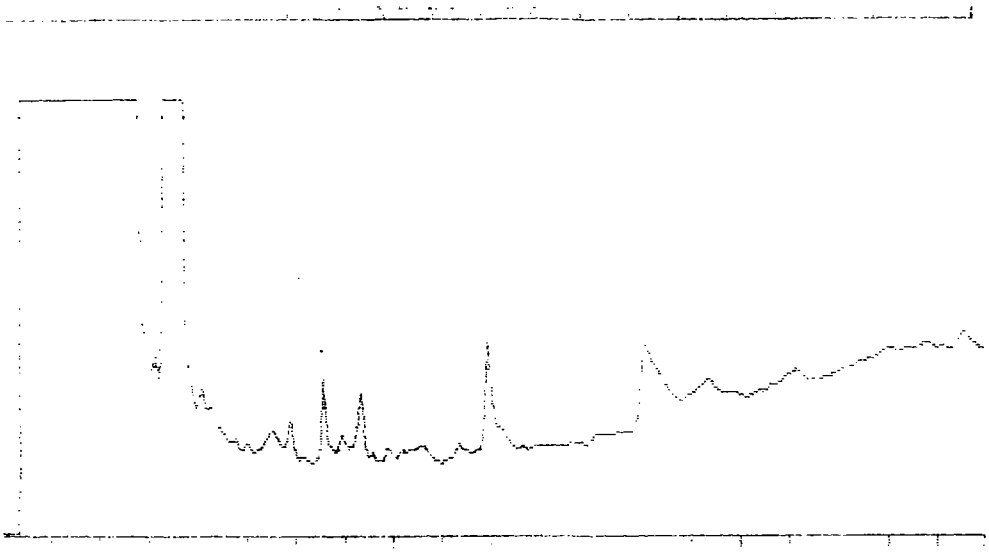
Areas, times, and heights stored in: E:P64921.ATB
Data File = E:P64921.PTS Printed on 01-30-1992 at 06:55:38
Start time: 0.00 min. Stop time: 20.00 min. Offset: 0 mv.
Low Value: 1 uv High Value: 999999 uv Scale factor: 1.0



GENERATOR:	KOCH PIPELINE	DATE:	02/04/92
DESTINATION:	CLAYTON CHEMICAL	LAB NUMBER:	16511
BOL NUMBER:	N/A	PROFILE NUMBER:	N/A

****

HEAT VALUE (BTU/LB):	8,737	DISTIL. YIELD (V/V %):	N/A
CHLORINE (W/W %):	1.14	K-F (W/W %):	N/A
DENSITY (g/mL DIRTY):	0.926	ACID ACCEPTANCE:	N/A
DENSITY (g/mL CLEAN):	N/A	ACIDITY (W/W %):	N/A
COMPATIBILITY:	OK	B. S. & W. (V/V %):	70
FLASH POINT (DEG. F):	73	COLOR (ASTM #):	N/A
G.C. SOLV:	N.D.	G.C. PCB'S:	N/A
pH:	N/A	LEAD (ppm):	N/A
ASH (W/W %):	1.57	VISCOSITY:	N/A



0-20 Min Scale: 500 Mv
P8511 Processed: 01-30-1992 07:18:15, segment 1, cycle 1
RAW DATA SAVED IN FILE E:P65111.PTS

EXTERNAL STANDARD TABLE

01-30-1992 07:18:25 Version 5.1

Sample Name: P8511 Data File: E:P65111
Date: 01-30-1992 07:18:47 Method: 1242 12-16-1991 23:03:52 # 13
Interface: 16 Cycle#: 1 Operator ff Channel#: 0 Vial#: N.A.
Starting Peak Width: 10 Threshold: 1 Area Threshold: 100

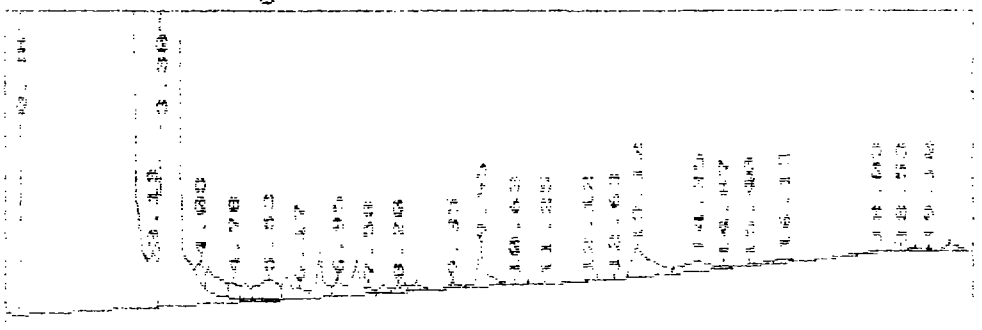
Starting Delay: 0.00 Ending retention time: 20.00
Area reject: 0 One sample per 1.000 sec.
Amount injected: 1.00 Dilution factor: 1.00
Sample Weight: 1.00000

PEAK NUM	RET TIME	PEAK NAME	CONCENTRATION in 1	NORMALIZED CONC	AREA	HEIGHT	AREA/ HEIGHT	BL	REF PEAK	% DELTA RET TIME	CONC/AREA
8	5.533	28	50.7344	19.7368%	1957412	64933	30.1	4	8	0	2.5919E-05
11	6.587	32	69.0905	26.8777%	1577589	128880	12.2	2	8	-.4190	4.3795E-05
12	6.950	37	33.6391	13.0884%	736952	52093	14.1	2	8	-1.891	4.5646E-05
15	7.900	40	9.9639	3.8761%	404543	29193	13.9	2	8	1.042	2.4630E-05
16	8.200	47	20.8661	8.1174%	272587	22216	12.3	2	8	1.284	7.6549E-05
17	8.350	54	12.8124	4.9843%	194046	22614	8.6	2	8	.3065	6.6028E-05
18	8.800	58	44.5458	17.3293%	577153	26296	21.9	2	8	-3.678	7.7182E-05
19	9.350	70	13.8183	5.3756%	321498	20026	16.1	2	8	-.7230	4.2981E-05
21	10.633	84	0.7823	0.3043%	18513	2690	6.9	4	8	1.314	4.2257E-05
22	10.900	98	0.8020	0.3120%	8646	921	9.4	1	8	-1.214	9.2765E-05

TOTAL AMOUNT : 257.0547

KPL 046

Areas, times, and heights stored in: E:P65111.ATB
Data File = E:P65111.PTS Printed on 01-30-1992 at 07:18:34
Start time: 0.00 min. Stop time: 20.00 min. Offset: 0 mv.
Low Value: 1 uv High Value: 999999 uv Scale factor: 1.0



1-20 Min Scale: 1000 Mv
16511 Processed: 02-04-1992 05:38:35, segment 20, cycle 20
RAW DATA SAVED IN FILE E:1651120.PTS

EXTERNAL STANDARD TABLE

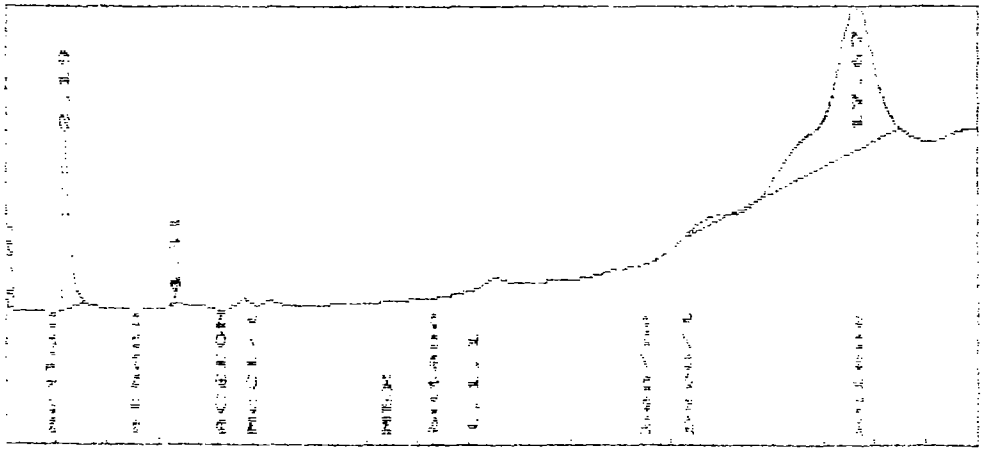
********** 02-04-1992 05:38:48 Version 5.1 **********
* Sample Name: 16511 Data File: E:1651120 *
* Date: 02-04-1992 12:44:25 Method: TEST 01-07-1992 13:57:45 # 107 *
* Interface: 16 Cycle#: 20 Operator ff Channel#: 0 Vial#: N.A. *
* Starting Peak Width: 5 Threshold: 10 Area Threshold: 500 *
****

Starting Delay: 1.00 Ending retention time: 20.00
Area reject: 100 One sample per 0.500 sec.
Amount injected: 1.00 Dilution factor: 1.00
Sample Weight: 1.00000

PEAK NUM	RET TIME	PEAK NAME	CONCENTRATION in %	NORMALIZED CONC	AREA	HEIGHT	AREA/ HEIGHT BL	REF PEAK	% DELTA RET TIME	CONC/AREA
4	17.667	xylene	0.4446	100.0000%	1153999	17840	64.7 1	4	0	3.8530E-07

TOTAL AMOUNT : 0.4446

Areas, times, and heights stored in: E:1651120.ATB
Data File = E:1651120.PTS Printed on 02-04-1992 at 05:38:56
Start time: 1.00 min. Stop time: 20.00 min. Offset: 0 mv.
Low Value: 5002 uv High Value: 42331 uv Scale factor: 1.0



INVOICE

CLAYTON CHEMICAL COMPANY

To: DOWELL SCHLUMBERGER
P O BOX 448
HIGHLAND IL 62249
Attn:

Inv No: 9289
Inv Date: 1/30/92
PO No:
Mnfst No: KOCH-002

Ship date: 1-28-92 KOCH PIPELINE Hauler: SCHIBER
For reclamation and/or disposal of waste solvent/oil/paint related materials, etc.

Waste stream #	Quantity	Drum/Gal	Price	Line Total
4907	3271	GAL	$0.300	$981.30

Freight in:
Freight out:
Total due: $981.30

THIS INVOICE IS DUE AND PAYABLE UPON RECEIPT.

REMITTANCE ADDRESS:
CLAYTON CHEMICAL COMPANY
P.O. BOX 502005
ST. LOUIS, MO 63150-2005

ALL OTHER INQUIRIES:
CLAYTON CHEMICAL COMPANY
#1 MOBILE AVENUE
SAUGET, ILLINOIS 62201
(618)271-0467

INVOICE

CLAYTON CHEMICAL COMPANY

To: DOWELL SCHLUMBERGER
P O BOX 448
HIGHLAND IL 62249
Attn: DENNIS WATTS

Inv No: 9467
Inv Date: 3/3/92
PO No:
Mnfst No: KOCH 3-23

Ship date: 2-28-92 KOCH PIPELINE Hauler: SCHIBER
For reclamation and/or disposal of waste solvent/oil/paint related materials, etc.

Waste stream #	Quantity	Drum/Gal	Price	Line Total
4907A	109257	GAL	$0.550	$60091.35

INCLUDES BILLS OF LADING #
0003 THROUGH 0023.

Freight in:
Freight out:
Total due: $60091.35

THIS INVOICE IS DUE AND PAYABLE UPON RECEIPT.

REMITTANCE ADDRESS:
CLAYTON CHEMICAL COMPANY
P.O. BOX 502005
ST. LOUIS, MO 63150-2005

ALL OTHER INQUIRIES:
CLAYTON CHEMICAL COMPANY
#1 MOBILE AVENUE
SAUGET, ILLINOIS 62201
(618)271-0467

Tank 30 cleaning
Bethany 1992

Bellamy Tank 30
Cleaning + Disposal

618-271-0467

ILD 066 918 327 - Dayton
RR-IL01
Delete → ILD006493191
H-1427

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102

July 6, 1992

Mr. Mike Costellecky
c/o Koch Pipelines, Inc.
Route #1
Eagleville, MO 64442

RE: Waste Oil Manifests

Dear Mr. Costellecky:

The purpose of this letter is to clarify Missouri hazardous waste regulations regarding waste oil. The department has completed a review of hazardous waste manifests initiated by your company. The review reveals a possible misunderstanding that waste oil is not regulated by Missouri.

The manifests in question are:

MANIFEST NUMBER:	DATE SHIPPED:
Bill of Ladings 003 thru 023	2/3/92 thru 2/27/92

Waste oil is defined as a Missouri hazardous waste (MO waste code - D098) and must be handled in accordance with 10 CSR 25-11.010. This includes registration by the actual generator and then depending on preagreements, manifesting and reporting by either the generator or the waste oil transporter. A copy of the Missouri waste oil regulations is enclosed for your review.

Also, please be reminded that alteration of the hazardous waste manifest (for example, crossing out the words "hazardous waste" on the manifest when shipping waste oil) constitutes a violation of Missouri rules and regulations.

KPL 052

In the future please make certain that waste oil is manifested properly. Also should you have any questions concerning waste oil or hazardous waste manifests or if you feel that the waste involved was not a waste oil (as defined by state regulations) please contact me at (314) 751-5402.

Sincerely,

HAZARDOUS WASTE PROGRAM

Kurt Hilsenbeck, Clerk IV
Planning and Reporting Section

KH:js

Enclosure

Title 10—DEPARTMENT OF NATURAL RESOURCES

Division 25—Hazardous Waste Management Commission

Chapter 11—Waste Oil

10 CSR 25-11.010 Waste Oil

PURPOSE: This rule establishes requirements for managing waste oil that are in addition to federal rules governing the management of used oil.

Editor's Note: The secretary of state has determined that the publication of this rule in its entirety would be unduly cumbersome or expensive. The entire text of the material referenced has been filed with the secretary of state. This material may be found at the Office of the Secretary of State or at the headquarters of the agency and is available to any interested person at a cost established by state law.

(1) Applicability. This rule applies to the management of waste oil and oily waste. Waste oil as defined in this section constitutes a Missouri hazardous waste. This section defines waste oil and oily waste, sets requirements for mixtures of waste oil or oily waste with another substance or waste, assigns a waste code number for waste oil, sets requirements for using absorbents to clean up *de minimus* spills and for submitting waste minimization plans, establishes testing and verification requirements and sets forth prohibitions and conditional exemptions.

(A) Waste oil is defined as any one (1) or more of the following wastes:

1. A waste that is or contains one (1) or more of the following derived-from petroleum(s): lubricating oil, transmission oil, transformer oil, hydraulic oil, fuel oil, cutting oil or heavy viscosity oil, provided the waste is not defined by or listed in 10 CSR 25-4.261;

2. Synthetic oil used as a substitute for petroleum-derived oil as defined in paragraph (1)(A)1. which contains waste defined by or listed in 10 CSR 25-4.261;

3. Any mixture of waste oil with nonhazardous waste if the resulting percentage of oil by volume is ten percent (10%) or greater, except as provided in subsection (1)(B) of this rule;

4. A mixture of waste oil with characteristic ignitable hazardous waste described, but not listed, in 10 CSR 25-4.261 if the mixture has a value greater than five thousand (5000) british thermal units (BTUs) per pound and if the flash point is at least one hundred forty degrees Fahrenheit (140°F);

5. A mixture of a waste oil with a solid, semi-solid or sludge if the mixture contains free liquids as determined in accordance with subsection (1)(B) of this rule; or

6. Used oil as defined in 40 CFR Part 266 Subpart E incorporated by reference in 10 CSR 25-7.266(1) and modified in 10 CSR 25-7.266(2)(E), regardless of whether it is on-specification or off-specification. (Note: 10 CSR 25-11 is in addition to the requirements in 10 CSR 25-7.266(1) and (2)(E) and is broader in its scope.)

(B) Oily Waste. An oily waste is a mixture of a waste oil with a solid, semi-solid or sludge provided that the mixture does not contain free liquids and that it is not defined by characteristic or listed as a hazardous waste in 10 CSR 25-4.261. The generator or facility owner/operator shall conduct, upon request of the department, test method 9095 (paint filter liquids test) at the base temperature of sixty degrees Fahrenheit (60°F) to demonstrate the absence or presence of free liquids. If the mixture contains free liquids, it is a waste oil governed by this rule. (Comment: See also subsection (7)(D) of this rule.) (Note: Test methods are in *Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods*, publication SW-846 of the United States Environmental Protection Agency.)

(C) Mixtures. This subsection sets forth requirements for managing mixtures of waste oil or oily waste with other substances or wastes.

1. Waste oil shall not be mixed with nonhazardous or hazardous substance(s) or waste(s) for the purpose of rendering the waste oil nonhazardous.

2. Waste oil or oily waste that is mixed with another hazardous waste defined by or listed in 10 CSR 25-4.261, except as allowed in paragraph (1)(A)4. of this rule, shall be managed in accordance with 10 CSR 25-3.260—10 CSR 25-9.020.

3. The intentional mixing of waste oil with any solid, semi-solid or sludge that would cause the mixture to meet the definition of oily waste is prohibited except as provided in paragraph (1)(C)4. of this rule. (Note: This prohibition does not apply in emergency response situations.)

4. The intentional mixing of any solid, semi-solid or sludge with waste oil to absorb *de minimus* spillage of the waste oil is subject to the following requirements:

A. Absorbent material that is used to collect waste oil resulting from *de minimus* spills incidental to prudent and reasonable operation is subject to the requirements in subsection (1)(B) of this rule; and

B. A generator or facility owner/operator shall submit a waste minimization plan to the department upon request. The plan shall be developed to reduce the amount of *de minimus* spillage and increase oil recovery and reuse when implemented.

(D) Disposal Into the Environment. Waste oil shall not be disposed of into the environment or in a manner that may cause a threat to human health or the environment or cause a public nuisance pursuant to section 260.380, RSMo. Any person who generates, stores, transports, blends, processes or otherwise handles waste oil shall not dispose of waste oil into the environment. A generator of waste oil, regardless of the amount of waste oil s/he generates or accumulates, shall not knowingly provide waste oil to another person for the purpose of disposal into the environment. The use of waste oil as a dust suppressant on a road, a parking lot, a driveway or another similar surface is prohibited.

(E) Waste oil is assigned the Missouri waste code number D098.

(2) Requirements for Generators. This section sets forth requirements for generators of waste oil.

(A) A person generating in one (1) month or accumulating at any one time one hundred kilograms (100 kg) or more of waste oil shall file a registration form with the department prior to shipping waste oil to a facility. An out-of-state person who generates in one (1) month or accumulates at any one (1) time one hundred kilograms (100 kg) or more of waste oil and uses a facility within Missouri shall file a registration form with the department prior to shipping waste oil to the facility. The generator shall use the registration forms provided by the department. If the generator's status changes, s/he shall complete and update the information on the department's form to reflect the change in generator status and shall file the updated form with the department. The generator shall provide the following information on the form: the generator's business name and mailing address, the name and address of the site where the waste oil is generated, the estimated amount of waste oil generated per month, the name and phone number of the owner of the business and the name(s) and address(es) of the firm(s) transporting waste oil from the premises. An authorized representative of the waste oil generator shall sign and date the registration form and shall certify by that signature that s/he attests that the information is complete and correct. The transporter may assist the generator with registration.

(B) A person who generates waste oil and/or oily waste may be required to verify by analysis and/or investigation that his/her waste oil or oily waste does not contain hazardous waste defined by or listed in 10 CSR 25-4 that requires hazardous waste

management according to 10 CSR 25-3—10 CSR 25-9.

(C) A person who generates waste oil and reuses the waste oil on the site where it is generated is exempt from the requirements in this section provided that the reuse does not constitute disposal into the environment. However, a generator is required to comply with 10 CSR 25-9, where applicable, if the generator reuses the waste oil on-site as a fuel.

(D) A generator who transports waste oil off-site shall do so in accordance with sections (4), (5) and (7) of this rule.

(E) Waste oil, regardless of quantity, shall not be sent to a Missouri solid waste disposal area unless it shall be for the purpose of resource recovery.

(3) Requirements for Storage of Waste Oil in Tanks and Containers. This section sets forth requirements for storage of waste oil in tanks and containers.

(A) A generator shall maintain sufficient storage facilities to store waste oil generated by him/herself and waste oil and waste oil containers returned to the generator by customers.

(B) 10 CSR 25-9 specifies when storage of waste oil on the site of generation shall require a permit under 10 CSR 25-7.

(C) A generator shall comply with the following standards and requirements:

1. A generator shall use tanks and containers that are strong and tight in their design and construction and that are free of significant deterioration and physical damage.

2. A generator shall conspicuously label all tanks and containers used to store waste oil that are five (5) gallons or larger in size. The words "Waste Oil" shall be printed in letters that are at least one and one-half inches (1 1/2") high and proportional in width. If the generator uses an underground tank to store waste oil and labeling is not practical, the generator shall post a sign or other similar designation within close proximity to the tank.

3. The generator shall ensure that all containers and tanks that are five (5) gallons or larger in size remain closed at all times except when waste oil is being added into or removed from the tanks or containers. (Note: This note is provided as a courtesy to the reader. The federal rules referred to in this note are not incorporated by reference in this rule. 40 CFR Part 280 sets forth requirements for storing waste oil in underground tanks. The Spill Prevention and Countermeasure Control rules in 40 CFR Part 112 apply to the above-ground storage of waste oil. Other federal, state or local rules might also apply to the storage of waste oil.)

(4) Requirements for Off-Site Shipments. This section sets forth requirements for removal of waste oil from the site.

(A) A generator shall ensure delivery of waste oil only to a facility that is approved by the environmental regulatory agencies of the receiving state for the management of waste oil.

(B) Except as provided otherwise in subsection (4)(E) of this rule, a waste oil generator shall only use transporters who are licensed by the department in accordance with 10 CSR 25-6.263.

(C) Prior to shipping waste oil to any facility, a waste oil generator shall enter into and maintain a written contract with each transporter who transports waste oil from the site. No contract is required when the generator is licensed under 10 CSR 25-6.263 and is the only transporter of his/her waste oil.

1. The contract shall stipulate whether the transporter shall initiate the manifest for each load or whether the generator shall initiate the manifest in accordance with 10 CSR 25-5.262 and the provisions of this rule.

2. A generator may have current contracts with more than one (1) licensed transporter.

3. The contract shall provide for collection of all waste oil and disposition at a treatment, storage or disposal facility permitted or operating under interim status under 10 CSR 25-7, a resource recovery facility certified under 10 CSR 25-9 or another facility that is approved by the authority of the receiving state to accept waste oil.

4. A waste oil generator shall maintain a copy of each contract at the facility. A waste oil generator shall make the contract(s) available for review by department personnel upon request.

(D) A generator shall initiate a separate manifest for a shipment of waste oil that contains one hundred kilograms (100 kg) or more of characteristic ignitable hazardous waste.

(E) A generator shall provide the required information and sign the transporter daily waste oil log at the time of pickup as described in subsection (5)(D) of this rule.

(F) A generator shall initiate a manifest if his/her waste oil constitutes a single load shipment.

(G) A generator who is not required to register according to subsection (2)(A) of this rule is exempt from the requirements of this section except that the generator shall comply with subsection (4)(E) of this rule if s/he uses a transporter licensed under 10 CSR 25-6 for removal of the waste oil from the site.

(H) A generator of an oily waste that is not a mixture described in paragraph (1)(C)2. of this rule shall either—

1. Ensure delivery of the oily waste to one (1) of the following types of facilities:

A. A facility that is permitted, licensed or registered by a state to manage municipal or industrial solid waste (Note: See also subsection (7)(D) of this rule.); or

B. A hazardous waste treatment, storage, resource recovery, recycling or disposal facility that has all required state and federal permits or authority under interim status to receive the oily waste from off-site; or

2. Manage the oily waste using another method that is approved in writing by the department.

(5) Requirements for Transportation of Waste Oil. This section sets forth requirements for the transportation of waste oil.

(A) A transporter who collects in one (1) month or accumulates at any one (1) time one hundred kilograms (100 kg) or more of waste oil shall obtain a license under and comply with 10 CSR 25-6.263.

(B) A transporter who collects waste oil from one (1) or more generator(s) located in Missouri shall enter into a contract described in subsection (4)(C) of this rule with each waste oil generator.

(C) A generator, transporter or authorized representative of the designated facility shall comply with the manifest requirements in this subsection, as applicable—

1. A transporter who collects waste oil under contract(s) with one (1) or more generator(s) shall initiate and/or sign the manifests in accordance with the terms of his/her respective contract(s) and the provisions of this rule;

2. Two (2) manifests shall be prepared for each load of waste oil that contains characteristic ignitable liquid hazardous waste. The generator or transporter shall prepare the manifest for the waste oil in accordance with the provisions of the respective contract(s). The generator shall prepare the manifest for the characteristic ignitable hazardous waste; and

3. An authorized representative of the facility that receives the waste oil shall sign and date each manifest to certify acceptance of the stated quantity in accordance with applicable federal and state regulations.

(D) A person who is licensed under 10 CSR 25-6.263 to transport waste oil shall maintain a daily waste oil log on a form provided by the department. The transporter shall record the following information on the waste oil daily log unless the generator is required to initiate a manifest in accordance with subsection (4)(F) of this rule: each generator's name, street address, city, state and Missouri generator identification number (if applicable); amount of waste oil gallons received from each

generator; total amount of gallons of waste oil collected per shipment; the Missouri transporter identification number; the manifest document number; and the number of pages that comprise the waste oil log. At the time of pickup, the transporter driver shall require an authorized representative of each waste oil generator to sign and date the daily waste oil log to verify the information recorded about the transaction. The transporter driver shall also sign the appropriate certification on the daily waste oil log attesting that the shipment is in compliance with applicable state and federal regulations.

(E) A transporter shall attach the daily waste oil log to the manifest that represents the respective load. The transporter shall file this information with the department in accordance with the generator reporting and manifest summary reporting requirements in 10 CSR 25-5.262(2)(D). The transporter shall retain the transporter copy of the manifest and the daily waste oil log for a period of three (3) years following collection of the waste oil. The period of record retention shall be extended upon written request of the department or automatically during the course of any unresolved enforcement action. When the transporter discontinues transport service, or when the license granted under 10 CSR 25-6.263 expires or is revoked by the department, the transporter shall forward all records that are less than three (3) years old to the department within ninety (90) days of discontinuance of the service or the expiration or revoking of the license.

(F) All waste oil that is not exempted from this rule, which is to be disposed of in Missouri, shall only be shipped to one (1) of the following types of facilities, provided that the designated facility is authorized to receive the waste oil generated off-site:

1. A hazardous waste treatment, storage or disposal facility permitted under 10 CSR 25-7.264 or under interim status under 10 CSR 25-7.265;

2. A resource recovery facility certified under 10 CSR 25-9.020; or

3. A polychlorinated biphenyl (PCB) facility that is permitted in accordance with 10 CSR 25-13.010 or is authorized as an interim status PCB facility in accordance with 10 CSR 25-13.010.

(6) Requirements for Facility Owners/Operators. This section sets forth additional requirements for facilities that reclaim or reuse waste oil for energy or materials recovery.

(A) Any facility that reclaims or reuses waste oil for energy or materials recovery shall operate as a certified resource recovery facility in compliance with the certification and 10 CSR 25-9.020.

(B) Any facility that reclaims or reuses waste oil for energy or materials recovery may be required to verify by analysis and/or investigation that the waste oil does not contain hazardous waste defined by or listed in 10 CSR 25-4.261 other than those approved by the department in the resource recovery facility certification and managed according to 10 CSR 25-3.260—10 CSR 25-9.020.

(C) This subsection provides an exemption for the owner/operator of a business which provides oil changing services at an off-site location. The owner/operator who collects the waste oil becomes the generator and transporter and shall meet all requirements for generators and transporters set forth in this rule. The oil may be temporarily stored prior to final delivery to a permitted, interim status, certified or other facility which has met all requirements for state and federal law, provided the following conditions are met:

1. Prior to use of this exemption, the business owner/operator shall provide written notification to the department of the following:

A. Location of the temporary storage;

B. Description of the storage method, that is to say, tank or container. The description must include volume and material of construction and must indicate above- or below-ground storage; and

C. The date that the temporary storage is expected to begin;

2. Only waste oil from motor vehicles is collected;

3. The waste oil is returned directly to the temporary storage and remains under the control of the owner/operator at all times;

4. The owner/operator does not mix the waste oil in temporary storage with any hazardous or nonhazardous waste other than waste oil while in temporary storage;

5. The owner/operator does not blend, process, reuse or reclaim the waste oil while it is in temporary storage, except in compliance with 10 CSR 25-9.020; and

6. The amount of waste oil in temporary storage shall not exceed one thousand gallons (1000 gal) at any one time. In the event that one thousand gallons (1000 gal) is never accumulated, the waste oil shall be transferred to a permitted, interim status, certified or other facility which has met all requirements for state and federal law at least every one hundred eighty (180) days.

(D) Any facility which receives manifested shipments of waste oil from off-site must have an authorized representative of the facility sign, date and manage the manifest in accordance with 10 CSR 25-3.260—10 CSR 25-9.020.

(7) This section sets forth requirements for low concentration PCB waste oil. Low concentration PCB waste oil is defined as any waste oil that contains equal to or greater than two parts per million (2 ppm) PCBs but less than fifty parts per million (50 ppm) PCBs provided that the waste is not PCB material as defined in 10 CSR 25-13.010. Sections (1)—(6) of this rule apply to low concentration PCB waste oil subject to the additions and modifications in this section.

(A) Low concentration PCB waste oil is assigned Missouri waste code number D096. The generator shall record this waste code in section 11.i. of any manifest that accompanies a consignment of low concentration PCB waste oil.

(B) A generator, transporter or owner/operator of a hazardous waste management facility, certified resource recovery facility or PCB facility that manages low concentration PCB waste oil may be required to verify by analysis and/or investigation that the waste is not PCB material as defined in 10 CSR 25-13.010.

(C) No person falsely shall claim that PCB material is low concentration PCB waste oil.

(D) No person shall dispose of oily waste resulting from a spill or leak of low concentration PCB waste oil in a solid waste landfill in Missouri except in accordance with approval from the department.

(E) This rule does not apply to capacitors that contain less than three (3) pounds of low concentration PCB waste oil or electrical equipment that has been drained of all free-flowing liquids.

Auth: sections 260.370, RSMo (Cum. Supp. 1990) and 260.430 and 260.437, RSMo (1986). This rule was previously filed as 10 CSR 25-4.020. Original rule filed July 16, 1979, effective Jan. 1, 1980. Amended: Filed March 13, 1981, effective July 13, 1981. Amended: Filed Aug. 12, 1981, effective Dec. 14, 1981. Amended: Filed May 12, 1983, effective Nov. 11, 1983. Amended: Filed Oct. 15, 1984, effective April 15, 1985. Amended: Filed Dec. 16, 1985, effective Oct. 1, 1986. Amended: Filed Feb. 3, 1987, effective Aug. 1, 1987. Amended: Filed Dec. 1, 1987, effective Aug. 12, 1988. Rescinded and readopted: Filed Feb. 16, 1990, effective Dec. 31, 1990. Amended: Filed Jan. 15, 1991, effective Oct. 1, 1991.

SCH[illegible] TRUCKING, INC.

LOADING/[illegible] REPORT

CONSIGNEE [illegible] DATE 1-27-92

ADDRESS [illegible] MANIFEST NO. 001

SHIPPER Koch Pipe Line PRODUCT Used fuel oil

ADDRESS [illegible] GA./LBS. 5516

WAS LOADING/~~UNLOADING~~ TIME SCHEDULED? (YES) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/~~UNLOAD~~ 12:00

TIME ARRIVED 12:00 TIME DEPARTED 15:00

REMARKS 12:00 waiting for personal To get back from lunch 13:00 - 14:30 loading 14:30 paper work and out @ 15:00

UNIT NO. 774-178 ~~CONSIGNEE~~/SHIPPER Koch Pipe line

DRIVER [signature] BY [signature]

NOTE: 300 GALS TANK

SCHUBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE CLAYTON CHEMICAL — DATE FEB. 24, 1992

ADDRESS - SIKESTON, MO — MANIFEST NO. 002

SHIPPER KOCH PIPELINE — PRODUCT UNLEADED FUEL

ADDRESS - EAGLEVILLE, MO — GA./LBS. 3773

WAS LOADING/UNLOADING TIME SCHEDULED? (YES) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/UNLOAD NOON (2-26-92)

TIME ARRIVED 10:00 A.M. 2-26 — TIME DEPARTED 4:00 PM (2-27-92

REMARKS: TANK STILL HAS 2600 GALS OF MATERIAL - 2-21-92
W.O. - FINISH VAC OUT IN AM 2-27-92 -
RESUME VAC OUT @ 0738-2-27-92
STARTED BLOWING OFF INTO #170 @ 2:00 P.M

UNIT NO. 239-170 — CONSIGNEE/SHIPPER KOCH PIPELINE

DRIVER [illegible] — BY C. O. England

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE CLINTON CHEM — DATE 2.19.92
ADDRESS SULLIVAN, IL — MANIFEST NO. 915
SHIPPER KOCH — PRODUCT WASTE OIL
ADDRESS EDGEVILLE, MO — GA. LBS. 4419
WAS LOADING/UNLOADING TIME SCHEDULED? (YES) NO (Circle One)
IF SO, TIME SCHEDULED TO LOAD/UNLOAD 1 PM
TIME ARRIVED 12:00 AM 2.19.92 TIME DEPARTED (2.20.92)
REMARKS 12-3 & 7-6pm
RAN OUT OF NO. 2 DIESEL
UNIT NO. 756-178 — CONSIGNEE/SHIPPER KOCH
DRIVER R. Damme — BY (illegible)

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton Chemical DATE 2-25-92
ADDRESS Sauget, Ill MANIFEST NO. 021
SHIPPER Koch Pipeline PRODUCT Oil
ADDRESS Eagleville, Mo. GA./LBS. 5100
WAS LOADING/UNLOADING TIME SCHEDULED? YES NO (Circle One)
IF SO, TIME SCHEDULED TO (LOAD) UNLOAD
TIME ARRIVED 6:30 Am TIME DEPARTED 5:30 pm
REMARKS drive to Job site
unit & transfer Load to 707

UNIT NO. 25894707 CONSIGNEE/SHIPPER Koch Pipeline
DRIVER M. Klopmeier BY [signature]

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton Chemical DATE 2-24-92
ADDRESS Sauget, Ill. MANIFEST NO. 021
SHIPPER Koch Pipeline PRODUCT Oil
ADDRESS Eagleville, Mo GA./LBS.
WAS LOADING/UNLOADING TIME SCHEDULED? YES NO (Circle One)
IF SO, TIME SCHEDULED TO (LOAD) UNLOAD
TIME ARRIVED 7:30 Am TIME DEPARTED 6:00 pm
REMARKS wait spot trailer & Load
leave unit at Job site
drive to motel

UNIT NO. 25894707 CONSIGNEE/SHIPPER KOCH Pipeline
DRIVER M. Klopmeier BY [signature]

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton Chemical DATE 2-26-92

ADDRESS Sauget Il MANIFEST NO.

SHIPPER Koch Pipeline PRODUCT

ADDRESS Eagleville Mo. GA./LBS.

WAS LOADING/UNLOADING TIME SCHEDULED? YES NO *(Circle One)*

IF SO, TIME SCHEDULED TO LOAD/UNLOAD

TIME ARRIVED 6:30 Am TIME DEPARTED 5:00 Pm

REMARKS

Provide Vacuum as needed

UNIT NO. 761-178 CONSIGNEE/SHIPPER Koch Pipelines

DRIVER David Scott BY [signature]

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton Chemical DATE 2-25-92

ADDRESS Sauget Il. MANIFEST NO.

SHIPPER Koch Pipeline PRODUCT

ADDRESS Eagleville Mo. GA./LBS.

WAS LOADING/UNLOADING TIME SCHEDULED? YES NO *(Circle One)*

IF SO, TIME SCHEDULED TO LOAD/UNLOAD

TIME ARRIVED 6:30 Am TIME DEPARTED 6:00 Pm

REMARKS

Provide Vacuum as needed and Transfer Load ~~[illegible]~~ onto other Truck

UNIT NO. 761-178 CONSIGNEE/SHIPPER Koch Pipelines

DRIVER David Scott BY [signature]

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton Chemical DATE 2-24-92
ADDRESS Sauget, IL MANIFEST NO.
SHIPPER Koch Pipeline PRODUCT
ADDRESS Eagleville Mo. GA./LBS.
WAS LOADING/UNLOADING TIME SCHEDULED? YES NO (Circle One)
IF SO, TIME SCHEDULED TO LOAD/UNLOAD 8:00 Am
TIME ARRIVED 7:30 Am TIME DEPARTED 6:00 Pm
REMARKS Get Set up & wait till Vacuum was needed to Provide Vacuum as needed

UNIT NO. 761-178 CONSIGNEE/SHIPPER Koch Pipeline
DRIVER David Scott BY Lee A. Enfield

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton Chemical DATE 2-27-92
ADDRESS Sauget, IL MANIFEST NO.
SHIPPER Koch pipe line PRODUCT
ADDRESS Eagleville Mo. GA./LBS.
WAS LOADING/UNLOADING TIME SCHEDULED? YES NO (Circle One)
IF SO, TIME SCHEDULED TO LOAD/UNLOAD
TIME ARRIVED 7:00 Am TIME DEPARTED 5:15 Pm
REMARKS Provide Vacuum as needed to blow Load onto other Truck & Transfer Diesel

UNIT NO. 761-178 CONSIGNEE/SHIPPER Koch Pipeline
DRIVER David Scott BY Lee A. Enfield

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton DATE 2/23/92

ADDRESS Sauget Ill MANIFEST NO. 919

SHIPPER Koch Pipeline PRODUCT Waste

ADDRESS Ferrellville KY GALS. 5024

WAS LOADING/UNLOADING TIME SCHEDULED? (YES) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/UNLOAD 8⁰⁰ AM

TIME ARRIVED 7³⁰ AM TIME DEPARTED 315 PM

REMARKS

Pump time 7⁴⁵ AM til 2⁴⁵ pm

UNIT NO. 768-168 CONSIGNEE/SHIPPER Koch

DRIVER Baugh BY [illegible]

CONTAINS HAZARDOUS MATERIALS

THIS MEMORANDUM

is an acknowledgment that a bill of lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. _____

Carrier's No. 017

SCHIBER TRUCK COMPANY, INC. (NAME OF CARRIER) SCAC _____ Date 2/19/91

TO:		FROM:	
Consignee	CLAYTON CHEMICAL COMPANY	Shipper	KOCH PIPELINE, INC.
Street	#1 MOBILE AVENUE	Street	RT. 1
Destination	SAUGET, IL Zip	Origin	EAGLEVILLE, MO Zip
Route:		Vehicle Number	

No. Units	HM	Kind of Packages, Description of Articles, and Special Marks of Hazardous Materials (Proper Shipping Name)	Hazard Class	ID Number	Packing Group	Weight	Rate	Collect
ONE T/T	X	OIL, NOS., COMBUSTIBLE LIQUID, NA 1270						
		TOTAL GALLONS: 5024						
		NOTE: THIS MATERIAL IS SUBJECT TO EPA REGULATION UNDER 40 CFR PART 266. MISSOURI SPECIAL WASTE CODE D098.						

Remit C.O.D. to:
Address:
City: State: Zip:

COD Amt: $

C.O.D. FEE:
Prepaid ☐
Collect ☐ $

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ _____ Per _____

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement.
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
_____ (Signature of Consignor)

FREIGHT CHARGES
PREPAID ☒ COLLECT ☐

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment. Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.
Per KOCH PIPELINE, INC.

PLACARDS REQUIRED: COMBUSTIBLE

SPECIAL INSTRUCTIONS:

PLACARDS SUPPLIED: ☒ YES ☐ NO — FURNISHED BY CARRIER
DRIVERS SIGNATURE:

SHIPPER: KOCH PIPELINE, INC.
PER:
DATE: 2-19-91

CARRIER: SCHIBER TRUCK COMPANY, INC.
PER:
DATE: 2/19/91

EMERGENCY RESPONSE TELEPHONE NUMBER: 816 878-6953

Monitored at all times the Hazardous Material is in transportation including storage incidental to transportation (172.604).

CONTAINS HAZARDOUS MATERIALS

KPL 064

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE [illegible] DATE 2-23-92

ADDRESS [illegible] MANIFEST NO. 020

SHIPPER Koch Pipeline PRODUCT Waste Liquid

ADDRESS Eagleville, Mo GAL/LBS. 5650

WAS LOADING/UNLOADING TIME SCHEDULED? YES (circled) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD (circled)/UNLOAD 8:00 AM

TIME ARRIVED 7:30 AM TIME DEPARTED 3:15 pm

REMARKS Spotted trailer at Koch Pipeline
to be loaded by Koch
pumping time 7:45 am 12:30 pm

UNIT NO. 760/165 CONSIGNEE/SHIPPER (SHIPPER circled) Koch Pipeline

DRIVER Ricky Reno BY [illegible signature]

/

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton CHEM DATE 2-22-92

ADDRESS SAUGET Ill MANIFEST NO. 018

SHIPPER KOCH PipeLine, Inc PRODUCT OIL

ADDRESS Blackville, MO GA./LBS. 5555

WAS LOADING/UNLOADING TIME SCHEDULED? (YES) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/UNLOAD NOON

TIME ARRIVED NOON TIME DEPARTED 5:15 PM

REMARKS

UNIT NO. 757 + 164 CONSIGNEE/SHIPPER KOCH

DRIVER Jerry B BY [signature]

SCHIBER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE [illegible] DATE 2-22-92

ADDRESS [illegible] MANIFEST NO. 917

SHIPPER [illegible] PRODUCT DC

ADDRESS [illegible] GA./LBS. 5517

WAS LOADING/UNLOADING TIME SCHEDULED? (YES) NO *(Circle One)*

IF SO, TIME SCHEDULED TO LOAD/UNLOAD

TIME ARRIVED 8:25 TIME DEPARTED 5:15

REMARKS

UNIT NO. 76-124 CONSIGNEE/SHIPPER [illegible]

DRIVER [illegible] BY [illegible]

TRUCK CO. INC.

LOADING/UNLOADING REPORT

CONSIGNEE: Clayton Chem. DATE: 2-21-92

ADDRESS: Sauget Ill. MANIFEST NO.:

SHIPPER: Koch Pipeline PRODUCT: Waste

ADDRESS: Iowa GA./LBS. 5500

WAS LOADING/UNLOADING TIME SCHEDULED? YES NO *(Circle One)*

IF SO, TIME SCHEDULED TO LOAD/UNLOAD

TIME ARRIVED 11:15 Am TIME DEPARTED 5:15 PM

REMARKS

UNIT NO. 766 + 178 CONSIGNEE/SHIPPER Koch

DRIVER Larry R Clark BY [illegible] England

SCHRER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE CLAYTON CHEMICAL — DATE FEB. 19, 1992

ADDRESS - SAUGET, ILL — MANIFEST NO. 014

SHIPPER KOCH PIPELINE — PRODUCT WASTE OIL

ADDRESS - EAGLESVILLE MO — GA./LBS. 5773

WAS LOADING/~~UNLOADING~~ TIME SCHEDULED? (YES) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/UNLOAD 10:00 AM (2/19)

TIME ARRIVED 9.00 A.M (2/19) TIME DEPARTED 4:00 PM. (2/20)

REMARKS

LOADING DELAYED TILL 2/19 DUE TO FUEL DELIVERY MISCOMMUNICATION.

UNIT NO. 755-150 — ~~CONSIGNEE~~/SHIPPER KOCH PIPELINE

DRIVER T WOLFE — BY C. A. England

59-754

1

[redacted] TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE [redacted] DATE FEB. 17, 1992

ADDRESS [redacted] MANIFEST NO. 012

SHIPPER KOCH PIPELINE PRODUCT WASTE OIL

ADDRESS [redacted] GAS, KY GA./LBS. 5773

WAS LOADING/UNLOADING TIME SCHEDULED? YES NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/UNLOAD NOON

TIME ARRIVED NOON (FEB. 17) TIME DEPARTED NOON (FEB. 18)

REMARKS BACKED IN TO LOAD @ 2:45 PM.
HAD TO WAIT ON GENE BAUGH TO FINISH LOADING
UNABLE TO FINISH LOADING DUE TO DARKNESS
FINISHED LOADING 2-18-92

UNIT NO. 155-170 CONSIGNEE/SHIPPER Koch PIPELINE

DRIVER [redacted] BY [redacted]

KPL 071

SCRIBER TRUCK CO., INC.

LOADING/~~UNLOADING~~ REPORT

CONSIGNEE Clayton DATE 2/15/92

ADDRESS Sauget, IL MANIFEST NO. 008

SHIPPER Koch Pipeline PRODUCT Waste

ADDRESS Englewood NJ GA./~~LBS.~~ 5650

WAS LOADING/~~UNLOADING~~ TIME SCHEDULED? (YES) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/~~UNLOAD~~ 8:00 AM

TIME ARRIVED 8:00 AM. TIME DEPARTED 10:00 AM

REMARKS Loading time 8:30 AM til 9:30 AM

UNIT NO. 768-150 ~~CONSIGNEE~~/SHIPPER Koch

DRIVER Keogh BY [signature]

CONTAINS HAZARDOUS MATERIALS

THIS MEMORANDUM

Is an acknowledgment that a bill of lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

Shipper's No. ______

Carrier's No. 0113

SCHIBER TRUCK COMPANY, INC.
(NAME OF CARRIER)

SCAC ______ Date ______

TO:		FROM:	
Consignee	CLAYTON CHEMICAL COMPANY	Shipper	KOCH PIPELINE, INC.
Street	#1 MOBILE AVENUE	Street	RT. 1
Destination	SAUGET, IL Zip	Origin	EAGLEVILLE, MO Zip

Route: | Vehicle Number

	HM							
ONE T/T	X	OIL, NOS., COMBUSTIBLE LIQUID, NA 1270						
		TOTAL GALLONS: 5650						
		NOTE: THIS MATERIAL IS SUBJECT TO EPA REGULATION UNDER 40 CFR PART 266. MISSOURI SPECIAL WASTE CODE D098.						

Remit C.O.D. to:
Address:
City: State: Zip:

COD Amt: $

C.O.D. FEE:
Prepaid ☐
Collect ☐ $

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding
$ ______ Per ______

(Signature of Consignor)

FREIGHT CHARGES
PREPAID ☒ COLLECT ☐

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. KOCH PIPELINE, INC.
Per ______

PLACARDS REQUIRED: COMBUSTIBLE

SPECIAL INSTRUCTIONS:

PLACARDS SUPPLIED ☒ YES ☐ NO — FURNISHED BY CARRIER
DRIVERS SIGNATURE:

SHIPPER: KOCH PIPELINE, INC.
PER: [signature]
DATE: [illegible]

CARRIER: SCHIBER TRUCK COMPANY, INC.
PER: [signature]
DATE: [illegible]

EMERGENCY RESPONSE TELEPHONE NUMBER: 816 878-6953

Monitored at all times the Hazardous Material is in transportation including storage incidental to transportation (172.604).

CONTAINS HAZARDOUS MATERIALS

KPL 073

SCHNEIDER TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE: CLAYTON CHEM DATE: 2.16.92

ADDRESS: BUGET, TX MANIFEST NO. 009

SHIPPER: PCH PRODUCT: WASTE OIL

ADDRESS: EAGLEVILLE, MO QTY. BBL: 3600

WAS LOADING/UNLOADING TIME SCHEDULED? YES NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/UNLOAD 9 AM

TIME ARRIVED 9 AM TIME DEPARTED 12:00

REMARKS:

UNIT NO. 756-164 CONSIGNEE/SHIPPER PCH

DRIVER [signature] BY [signature]

/

[illegible] TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE [illegible] DATE 2/12/92

ADDRESS [illegible] MANIFEST NO. 007

SHIPPER Koch Pipeline PRODUCT Waste

ADDRESS [illegible], Mo GA./LBS. 5800

WAS LOADING/~~UNLOADING~~ TIME SCHEDULED? (YES) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/~~UNLOAD~~ 11:00 AM

TIME ARRIVED 11:00 AM 2/12/92 TIME DEPARTED 12:15 PM.

REMARKS Cold weather, cold and thick product cause us a lot of equipment trouble, "lay over" shut down 6:15 PM. 2/12/92, Return 7:00 AM 2/13/92.

UNIT NO. 708-164 ~~CONSIGNEE~~/SHIPPER Koch

DRIVER [illegible] BY [signature]

SCHMIDT TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE [illegible] DATE 2.7.92

ADDRESS [illegible] MANIFEST NO. 006

SHIPPER [illegible] PRODUCT Waste Oil

ADDRESS [illegible] GAL/LBS. 4706

WAS LOADING/UNLOADING TIME SCHEDULED? YES NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/UNLOAD 7AM

TIME ARRIVED 7 AM TIME DEPARTED 8.30

REMARKS

UNIT NO. 756-174 CONSIGNEE/SHIPPER [illegible] Bros Inc

DRIVER [illegible] BY [illegible]

TRUCK CO., INC.

LOADING/UNLOADING REPORT

CONSIGNEE [illegible] DATE 3-3-92

ADDRESS [illegible] ILL. MANIFEST NO. 005

SHIPPER KOCH PIPELINE PRODUCT Waste

ADDRESS [illegible], Iowa. GAL/LBS. 5200

WAS LOADING/UNLOADING TIME SCHEDULED? YES NO *(Circle One)*

IF SO, TIME SCHEDULED TO LOAD/UNLOAD

TIME ARRIVED [illegible] 30 pm TIME DEPARTED 6:30 pm

REMARKS

UNIT NO. 766 + 172 CONSIGNEE/SHIPPER Koch

DRIVER Larry R Clark BY [illegible]

SCHIBER TRUCK CO., INC.

LOADING/~~UNLOADING~~ REPORT

CONSIGNEE Clayton DATE 2/3/92

ADDRESS Sauget IL MANIFEST NO. 0004

SHIPPER Koch Pipeline PRODUCT Waste

ADDRESS Eagleville MO GA./~~LBS.~~ 5516

WAS LOADING/~~UNLOADING~~ TIME SCHEDULED? (YES) NO (Circle One)

IF SO, TIME SCHEDULED TO LOAD/~~UNLOAD~~ 10:30 AM

TIME ARRIVED 10:30 AM TIME DEPARTED 6:30 PM

REMARKS

Pump time 12:55 PM til 2:10 PM

Balance of time waiting for

the manifest tobe sign.

UNIT NO. 768-174 CONSIGNEE/~~SHIPPER~~ Koch

DRIVER Brutch BY [signature]

[illegible] TRUCK CO. INC.

LOADING/UNLOADING REPORT

CONSIGNEE Clayton Chemical DATE 2-3-92
ADDRESS Sauget Illinois MANIFEST NO. 0[illegible]003
SHIPPER Koch Pipeline PRODUCT 12[illegible]
ADDRESS Eagle Ville Missouri GALLONS 5[illegible]00
WAS LOADING/UNLOADING TIME SCHEDULED? YES NO (Circle One)
IF SO, TIME SCHEDULED TO LOAD/UNLOAD 8 Am
TIME ARRIVED 7:30 Am TIME DEPARTED 6:30 PM
REMARKS
THICK START Pump 8:Am
END Pump 12:noon
WAIT FOR PAPERS TO BE SIGNED
UNIT NO. 770-176 CONSIGNEE/SHIPPER Koch Pipeline
DRIVER Ollie BY [signature]

KOCH PIPELINE INC. TANK REPORT

DATE;	February 29, 1992
TIME;	7:00 AM
LOCATION;	Bethany Mo.
TANK NO.	30
STEEL (FLOOR)	.250 Wall
ROFF SUPPORTS;	.250 Wall x 2' in Diameter
SUMPS;	.500 Wall
SUCTION;	.500 Wall
RECEIVE LINE;	.250 Wall with saddle
ROOF VENTS;	No corrosion
ROOF SEAL;	Good visible condition
ROOF LEGS;	No corrosion
ROOF DRAIN;	Good visible condition
TANK CHIME;	No corrosion or coating disbondment
SETTLEMENT;	All settlement in this vessal was very minimal, not exceeding 2 to 3 inchs in depth and 3 foot in diameter.
PREVIOUS REPAIRS;	4 - .250 x1" in diameter, near center
WELDS;	No corrosion was visible and all welds were continuous.
COATING;	Two coat epoxy-- This coating appeared to be applied with a 10 Mil minimum. All welds were stripe\coated.(Brushed) Mil or DFT readings near welds, ranged from 14 to 18 mils. Below are DFT measurements for the remainder of this vessel, following guidlines set forh by SSPC-PA2.

SPOT	MIL-READINGS		TOTAL		TOTAL	%
1	14.5/13.5/15	=	43.0	/ 3	= 14.3	143%
2	13/ 10/ 12	=	35.0	/ 3	= 11.7	117%
3	11/ 10/ 11	=	32.0	/ 3	= 10.7	107%
4	10/ 10.5/ 11	=	31.5	/ 3	= 10.5	105%
5	9.5/ 10.5/11.5	=	31.5	/ 3	= 10.5	105%
					57.7 / 5 = 11.5	

SPOT	MIL-READINGS		TOTAL		TOTAL	%
1	10/ 9.5/ 10.5	=	30.0	/ 3	= 10.0	100%
2	10/ 13/ 14	=	37.0	/ 3	= 12.3	123%
3	9/ 9/ 10.5	=	28.5	/ 3	= 9.5	95%
4	14.5/ 13/ 15	=	42.5	/ 3	= 14.2	142%
5	11/ 9.5/ 12	=	32.5	/ 3	= 10.8	108%
					56.8 / 5 = 11.4	

SPOT	MIL-READINGS		TOTAL		TOTAL	%
1	12/ 11/ 9.5	=	32.5	/ 3	= 10.8	-------108%
2	9/ 10/ 10.5	=	29.5	/ 3	= 9.8	------- 98%
3	11/ 9.5/ 12	=	32.5	/ 3	= 10.8	-------108%
4	11/ 13/ 10.5	=	34.5	/ 3	= 11.5	-------115%
5	11/ 13/ 15	=	39.0	/ 3	= 13.0	-------113%
					55.9 / 5 = 11.2	

SPOT	MIL-READINGS		TOTAL		TOTAL	%
1	12.5/ 11.5/ 11	=	35.0	/ 3	= 11.7	-------117%
2	10.5/ 10/ 11	=	31.5	/ 3	= 10.5	-------105%
3	9.5/ 10/ 12	=	31.5	/ 3	= 10.5	-------105%
4	13/ 10.5/ 11.5	=	35.0	/ 3	= 11.7	-------117%
5	11.5/ 11/ 12	=	34.5	/ 3	= 11.5	-------115%
					55.9 / 5 = 11.2	

SPOT	MIL-READINGS		TOTAL		TOTAL	%
1	10/ 10.5/ 11	=	31.5	/ 3	= 10.5	-------105%
2	11/ 11.5/ 11	=	33.5	/ 3	= 11.2	-------112%
3	11/ 10.5/ 10	=	31.5	/ 3	= 10.5	-------105%
4	10/ 9.5/ 10.5	=	30.5	/ 3	= 10.2	-------102%
5	11/ 12/ 11.5	=	34.5	/ 3	= 11.5	-------115%
					53.9 / 5 = 10.8	

SPOT	MIL-READINGS		TOTAL		TOTAL	%
1	9.5/ 10.5/ 10	=	30.0	/ 3	= 10.0	-------100%
2	10/ 11/ 9.5	=	30.5	/ 3	= 10.2	-------102%
3	11/ 10/ 10	=	31.0	/ 3	= 10.3	-------103%
4	10/ 11.5/ 12	=	33.5	/ 3	= 11.2	-------112%
5	12/ 11.5/ 11	=	34.5	/ 3	= 11.5	-------115%
					53.2 / 5 = 10.6	

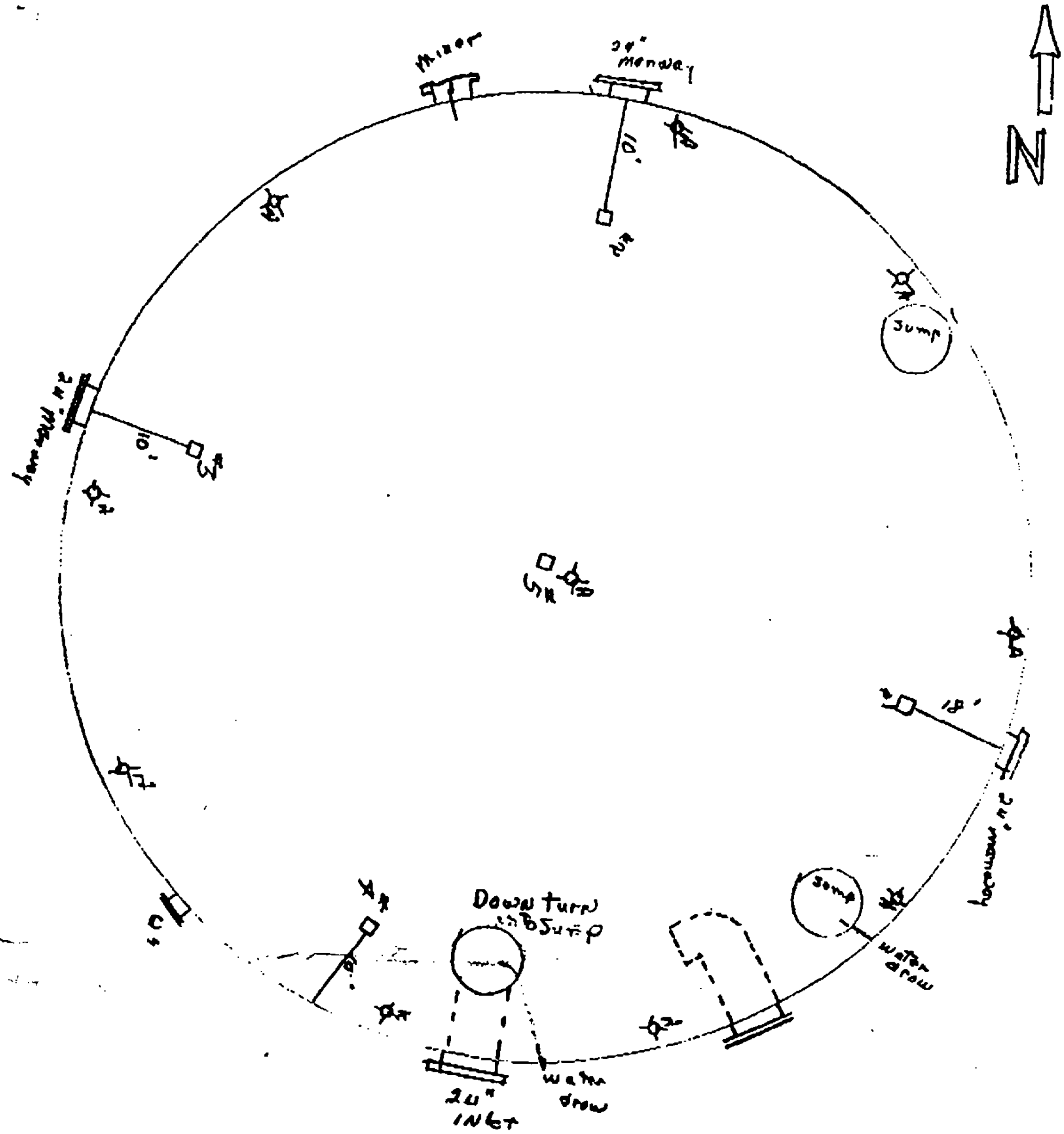
SPOT	MIL-READINGS		TOTAL		TOTAL	%
1	13/ 13.5/ 12	=	38.5	/ 3	= 12.8	-------128%
2	12/ 12.5/ 13.5	=	38.0	/ 3	= 12.7	-------127%
3	10/ 11.5/ 12	=	33.5	/ 3	= 11.2	-------112%
4	9.5/ 12.5/ 11	=	33.0	/ 3	= 11.0	-------110%
5	11/ 11.5/ 11	=	33.5	/ 3	= 11.2	-------112%
					58.9 / 5 =11.9	

SPOT	MIL-READINGS		TOTAL		TOTAL	%
1	13/ 12/ 11.5	=	36.5	/ 3	= 12.2	-------122%
2	12/ 12.5/ 11	=	35.5	/ 3	= 11.8	-------118%
3	14/ 12.5/ 13	=	39.5	/ 3	= 13.2	-------132%
4	12/ 11/ 10.5	=	33.5	/ 3	= 11.2	-------112%
5	10.5/ 12.5/ 12	=	35.0	/ 3	= 11.7	-------117%

DEFECTS; This coating showed no signs of blisters, pinholes, fisheyes, sags, or cracking. Coating was lacking between rooflegs and supports plates. These areas showed no excessive metal loss.

PREVENTION; To assist in corrosion prevention, 15 anodes will be added to the interior, 14 anodes will be spaced 33 feet 6 inchs apart and 3 foot off of chime(welded to floor), with one anode placed near the the center of this vessel. This work will be completed by MARCH 3, 1992

DAN LISS
CORROSION TECH.
COATING INSPECTOR
NACE LEVEL 3 #2257



□ - - - Coupons

⌖ - - - Anodes

All of the coupons that were cut from the floor of tank 30 appeared to have a clear coating on them. There was sand adhered to the coating leading me to believe that the floor panels were coated with a clear epoxy and laid down wet.

As noted on the attached drawing, the coupons were taken from the four quarters of the tank. On coupons 1,2,4,and 5 I saw no sign or evidence of corrison under the coating. On coupon #3, there appeared to be water spots. What shows to be a bright spot is a buffer spot cleaned to bare metal.

The coupons were welded back into the respective holes that they were cut from. Aone-fourth (¼) inch thick plate was cut allowing for a two (2) inch overlap of the coupons and welded over the coupons. The plates were buffed clean and coated with epoxy.

While the tank was out of service, anodes were installed on the tank floor. The anodes were positioned and installed two(2) feet from the chime fifty-two feet seven inches (52'7") apart.

Cuin A. England